

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
ENVIRONMENTAL SCIENCE CENTER  
Office of Analytical Services and Quality Assurance  
701 Mapes Road  
Fort Meade, MD 20755-5350**

November 29, 2011

Dr. Andrea Labik, Director  
Office of Laboratory Services  
Bureau for Public Health  
West Virginia Department for Health and Human Resources  
167 11th Avenue  
South Charleston, West Virginia 25303

Dear Dr. Labik:

The U.S. Environmental Protection Agency Region III (EPA) has received your request for interim Safe Drinking Water Act certification and has reviewed the following materials:

- 1) Method Detection Limit (MDL) study.
- 2) Demonstration of Capability (DOC) study.
- 3) Proficiency Testing (PT) Study results (QK 081911B).
- 4) Analytical Standard Operating Procedures (SOP) describing ~~in detail~~ the technical procedures in detail.
- 5) Copies of the reference analytical methods (EPA 353.2, rev. 2.0 and Seal Analytical methods PA-126A, rev. 5 and 2-013-1-H, rev. July 2003).
- 6) Approval of the Seal Analytical methods for use in the SDWA program (letter dated June 7, 2004 from William Telliard and Herb Brass and the letter dated March 14, 2008 from Steven Wendelken).

The MDL, DOC and PT summaries indicated acceptable accuracy, precision, and detection for SDWA analyses. The provided documentation, including analytical instrument data, bench records, and other materials, supported these summaries. The procedures were shown sensitive enough to support drinking water compliance analyses (MDLs and quantitation limits below SDWA Maximum Contaminant Levels-MCLs). In addition, the SOP listed procedures were found compliant with the SDWA mandated methods.

However, EPA recommends the following minor adjustments with the next revision of the SOP:

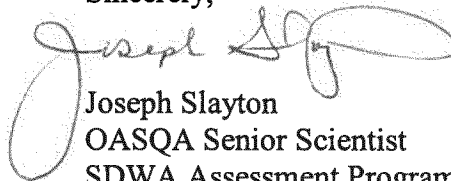
- 1) Describe in more detail the preparation of the calibration standards and their concentrations.
- 2) On page 8, section 7.1.8, the compound EDTA should read as "ethylenediamine tetraacetic acid".

- 3) The technical Review Checklist "TRC" for peer review and bench sheet template or a combination (single form,) should be as an attachment/s to the SOP.
- 4) The sources of the quality control acceptance limits should be listed.
- 5) A definition section would be helpful. This could point to the laboratory's Quality Manual for terms defined in that document.
- 6) Consideration should be given to using the term "Initial Calibration Verification" (ICV) to indicate a source of reference material different from that used to prepare the calibration standards and the term "Continuing Calibration Verification" (CCV) to indicate checks prepared from the same material used for the initial calibration. These terms and definition are routinely used in the environmental laboratory community.
- 7) Section 11 of the SOP should be updated to explain the calculation of the NO<sub>3</sub>-N performed by the Seal Analytical instrument software or the manual calculation currently described in the SOP employed.

Based on the review of this material and given the successful performance on the PT survey, I am recommending interim SDWA certification for NO<sub>2</sub>-N by 2-013-1-H, rev. July 2003 and for NO<sub>3</sub>-N and total (NO<sub>2</sub>+NO<sub>3</sub>)-N by EPA-126A, rev. 5. EPA Region III routinely issues new SDWA certificates by the end of December (effective January 1 and in effect until December 31<sup>st</sup>). The requested interim certification will be officially effective with next year's certificate issued by the Regional SDWA Certification Authority (January 1, 2012).

If you have any questions or concerns please contact me at (410-305-2653 or [Slayton.joe@epa.gov](mailto:Slayton.joe@epa.gov) by December 15, 2011 prior to the approval and signature of the final certificate by John Pomponio, the Regional Certification Authority.

Sincerely,



Joseph Slayton  
OASQA Senior Scientist  
SDWA Assessment Program Manager

cc: Charlotte Billingsley (WV OLS)  
Gregory Young (WV OLS)  
Thomas Ong (WV OLS)